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11 IN THE UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 APPROXIMATELY \$32,340.00 IN U.S.  
17 CURRENCY,

Defendant.

CASE NO.: 1:20-MC-00111-AWI

CONSENT JUDGMENT OF  
FORFEITURE

18 Pursuant to the Stipulation for Consent Judgment of Forfeiture, the Court finds:

19 1. On May 28, 2020, inspectors with the United States Postal Inspection Service (“USPIS”)  
20 seized Approximately \$32,340.00 in U.S. Currency (hereafter “defendant currency”) during a parcel  
interdiction at the Processing and Distribution Center located in Fresno, California.

21 2. USPIS commenced administrative forfeiture proceedings, sending direct written notice  
22 to all known potential claimants and publishing notice to all others. On or about July 27, 2020, USPIS  
23 received a claim from Sandra Castillo asserting an ownership interest in the defendant currency.

24 3. The United States represents that it could show at a forfeiture trial that on May 23,  
25 2020, USPIS conducted a parcel interdiction at the Processing and Distribution Center located at  
26 1900 E Street, Fresno, California. During the interdiction, law enforcement officials identified a  
27 parcel that bore markers consistent with parcels used for shipping contraband, Priority Mail parcel

1 number 9505 5122 3663 0141 5481 29. The parcel was addressed to Sandra Castillo, P.O. Box  
2 #9898, Fresno, CA 93794, with the following return address: Cris Castillo, 8176 SW 56th Ave Rd,  
3 Ocala, FL 34476. Law enforcement searched public records databases and were unable to identify  
4 Cris Castillo associated with the return address. Contact was made with the Post Office that delivers  
5 to the Ocala, Florida address. The postal carrier for that address told law enforcement that he delivers  
6 mail to Diana Ingalls and Kristen Montgomery but did not recognize Cris Castillo's name.

7 4. Law enforcement confirmed with the post office that delivers mail to P.O. Box 9898,  
8 Fresno, CA 93794 that Sandra Castillo is the applicant the post office box.

9 5. The United States represents that it could further show at a forfeiture trial that the  
10 parcel was presented to a drug detection dog, who positively alerted to the presence of the odor of  
11 narcotics.

12 6. The United States represents that it could further show at a forfeiture trial that on May  
13 28, 2020, law enforcement obtained a search warrant to open Priority Mail parcel number 9505 5122  
14 3663 0141 5481 29. Inside the parcel was packing paper and a gift-wrapped box. Inside the gift-  
15 wrapped box, law enforcement found a Sentry safe that contained multiple rubber-banded bundles of  
16 U.S. Currency secured in vacuum-sealed plastic. The cash totaled \$32,340.00. The currency  
17 consisted mainly of \$20 bills, making up \$29,080.00 of the \$32,340.00. The package did not contain  
18 any notes, instructions, or receipts.

19 7. The United States could further show at a forfeiture trial that the defendant currency is  
20 forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

21 8. Without admitting the truth of the factual assertions contained in this stipulation,  
22 claimant specifically denying the same, and for the purpose of reaching an amicable resolution and  
23 compromise of this matter, claimant agrees that an adequate factual basis exists to support forfeiture  
24 of the defendant currency. Sandra Castillo hereby acknowledges that she is the sole owner of the  
25 defendant currency, and that no other person or entity has any legitimate claim of interest therein.  
26 Should any person or entity institute any kind of claim or action against the government with regard  
27 to its forfeiture of the defendant currency, claimant shall hold harmless and indemnify the United  
28 States, as set forth below.

1       9. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355, as  
2 this is the judicial district in which acts or omissions giving rise to the forfeiture occurred.

3       10. This Court has venue pursuant to 28 U.S.C. § 1395, as this is the judicial district in  
4 which the defendant currency was seized.

5       11. The parties herein desire to settle this matter pursuant to the terms of a duly executed  
6 Stipulation for Consent Judgment of Forfeiture.

7              Based upon the above findings, and the files and records of the Court, it is hereby ORDERED  
8 AND ADJUDGED:

9       1. The Court adopts the Stipulation for Consent Judgment of Forfeiture entered into by  
10 and between the parties.

11       2. Upon entry of this Consent Judgment of Forfeiture, \$28,340.00 of the Approximately  
12 \$32,340.00 in U.S. Currency, together with any interest that may have accrued on the total amount  
13 seized, shall be forfeited to the United States pursuant to 21 U.S.C. § 881(a)(6), to be disposed of  
14 according to law.

15       3. Upon entry of this Consent Judgment of Forfeiture, but no later than 60 days  
16 thereafter, \$4,000.00 of the Approximately \$32,340.00 in U.S. Currency shall be returned to claimant  
17 Sandra Castillo through her attorney, Yan Shrayberman.

18       4. The United States of America and its servants, agents, and employees and all other  
19 public entities, their servants, agents and employees, are released from any and all liability arising out  
20 of or in any way connected with the seizure or forfeiture of the defendant currency. This is a full and  
21 final release applying to all unknown and unanticipated injuries, and/or damages arising out of said  
22 seizure or forfeiture, as well as to those now known or disclosed. Claimant waived the provisions of  
23 California Civil Code § 1542.

24       5. No portion of this stipulated settlement, including statements or admissions made  
25 therein, shall be admissible in any criminal action pursuant to Rules 408 and 410(a)(4) of the Federal  
26 Rules of Evidence.

27       6. All parties will bear their own costs and attorney's fees.

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1       7. Pursuant to the Stipulation for Consent Judgment of Forfeiture filed herein, the Court  
2 enters a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465, that there was reasonable  
3 cause for the seizure of the above-described defendant currency.

4 IT IS SO ORDERED.  
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6 Dated: April 23, 2021

  
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10 SENIOR DISTRICT JUDGE